

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
KEIRI YENNISEL CONCEPCION : CASE NO. 5-21-02432
: :
Debtor : CHAPTER 13

NISSAN MOTOR ACCEPTANCE :
CORPORATION, AS SERVICING AGENT :
FOR INFINITI FINANCIAL SERVICES :
: :
Movant, :
vs. :
: :
KEIRI YENNISEL CONCEPCION :
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Keiri Yennisel Concepcion, and files an Answer to Nissan Motor
Acceptance Corporation's Motion for Relief From the Automatic Stay:

1. Keiri Yennisel Concepcion, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Jack N. Zaharopoulos was appointed the Chapter 13 Trustee.
3. Under the Chapter 13 Plan, Debtor was to make regular monthly payments to the Movant outside of the Plan.
4. Movant alleges that Debtor has failed to make monthly car loan payments.
5. Debtor's Counsel is in the process of contacting the Debtor to ascertain if said payments have been made and/or if Debtor is in possession of said payments.

6. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears by including them in an amended Plan, or in the alternative over a six month period.

7. Movant is not entitled to relief from the automatic stay as there is equity in the property encumbered by Movant's security interest, arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 14, 2022

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
KEIRI YENNISEL CONCEPCION : CASE NO. 5-21-02432
: :
Debtor : CHAPTER 13

NISSAN MOTOR ACCEPTANCE :
CORPORATION, AS SERVICING AGENT :
FOR INFINITI FINANCIAL SERVICES :
:
Movant, :
vs. :
:
KEIRI YENNISEL CONCEPCION :
Respondents. :

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 14, 2022, he caused a true and correct copy of
Debtor's Answer to Nissan Motor Acceptance Corp's Motion for Relief from the Automatic Stay to be
served via electronic filing to the CM/ECF participant at the following:

Jack N. Zaharopoulos, Esq. at info@pAMD13trustee.com

Keri P. Ebeck, Esq. Kebeck@bernsteinlaw.com

Date: April 14, 2022 /s/Tullio DeLuca
Tullio DeLuca, Esq.